NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 4, 1995

Mr. Steven S. Ball Vice President - Operations & Engineering Williams Pipe Line Company P.O. Box 3448 One Williams Center Tulsa, Oklahoma 74101

CPF No. 35521M

Dear Mr. Ball:

On April 11 & 13, June 12-14, and August 7-11, 1995, a representative of the Central Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of your facilities and records in Oklahoma, Kansas, Illinois, Iowa, Minnesota, and Wisconsin.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 195. The items inspected and the probable violations are:

- 1. § 195.402 Procedural manual for operations, maintenance, and emergencies.
 - (a) Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective.
 - § 195.402 Operations, maintenance and, abnormal operations.
 - § 195.402(c)(3) requires that the manual required by § 195.402(a) must provide for operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of Subpart F of Part 195.
 - § 195.402(d) requires that the manual required by § 195.402(a) must provide procedures that provide safety.

Review of Williams Pipe Line Company (Williams) O&M procedural manuals found the procedures were inadequate, as noted below. The procedures require expansion to include additional detail in regard to the following items, as reviewed with Williams personnel

during the inspection:

- a) Submission of a supplemental DOT 7000-1 whenever an operator receives any changes in the information reported or additions to the original report, as required by § 195.54(b).
- b) Periodically reviewing the work done by the operator personnel to determine the effectiveness of the procedures, as required by § 195.402 (c)(13).
- c) Periodically reviewing the work done by the operator personnel to determine the effectiveness of the procedures controlling abnormal operation, as required by § 195.402(d)(5).

When it is found that an operator's procedures are inadequate, 49 C.F.R. § 190.237 provides that the operator, after notice and opportunity for hearing may be required to amend its plans and procedures. This letter serves to provide you with notice of the inadequate procedures and the response options as prescribed under § 190.237. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request a hearing. After considering the material presented, the Office of Pipeline Safety is required to notify the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, please provide the revised procedures within thirty (30) days of receipt of this notice.

Sincerely,

Ivan A. Huntoon Director, Central Region Office of Pipeline Safety